

NO. 2017-65533

MARCUS WILSON,
Plaintiff,

v.

TEICHMAN GROUP, LLC, T&T MARINE,
INC., EXPRESS PROFESSIONAL
SERVICES, INC. & OSG LIGHTERING, LLC,
Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

190TH JUDICIAL DISTRICT

**TEICHMAN GROUP, LLC AND T&T MARINE, INC.'S
RESPONSES TO PLAINTIFF'S REQUEST FOR DISCLOSURES**

To: Plaintiff Marcus Wilson, by and through his attorney of record, Anthony G. Buzbee, The Buzbee Law Firm, 600 Travis, Suite 6850, Houston, Texas 77002.

Pursuant to the Texas Rules of Civil Procedure, Defendants serve the attached Disclosures.

Respectfully submitted,

SCHOUEST, BAMDAS, SOSHEA &
BENMAIER, PLLC

/s/ Susan Noe Wilson

SUSAN NOE WILSON

State Bar No. 15055025

snoewilson@sbsblaw.com

MICHAEL W. HOGUE

State Bar No. 09809800

mhogue@sbsblaw.com

1001 McKinney, Suite 1400

Houston, TX 77002

Phone: 713-588-0446

Fax: 713-574-2942

ATTORNEYS FOR DEFENDANTS

TEICHMAN GROUP, LLC AND

T&T MARINE, INC.

**PLAINTIFF'S
EXHIBIT**

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exhibitsticker.com

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2017, in accordance with the Texas Rules of Civil Procedure, a true and correct copy of the foregoing has been served on all known counsel of record.

/s/ Susan Noe Wilson

Susan Noe Wilson

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S REQUEST FOR DISCLOSURES**

- (a) the correct names of the parties to the lawsuit;

RESPONSE: Defendants have been correctly identified, but are not proper parties to this lawsuit.

- (b) the name, address, and telephone number of any potential parties;

RESPONSE: T&T Offshore, Inc.
c/o Susan Noe Wilson
Schouest, Bamdas, Soshea & BenMaier, PLLC
[REDACTED]
Houston, TX 77002
[REDACTED]

Express Services, Inc. d/b/a Express Employment Professionals
[REDACTED]
Texas City, TX 77591
[REDACTED]

Cheramie Marine LLC
[REDACTED]
Larose, LA 70373
[REDACTED]

- (c) the legal theories and, in general, the factual bases of your claims or defenses;

RESPONSE: Plaintiff lacks the capacity and/or standing to sue as alleged in his Petition.

Defendants generally deny each of the material allegations made in Plaintiff's Petition and generally deny they committed any acts and/or omissions of negligence and/or proximately caused, contributorily cause, or were the producing cause in the acts, omissions, negligence, and/or conduct of fault with respect to Plaintiff's claims forming the basis of this lawsuit. If Plaintiff was damaged as alleged, such damages, if any, were proximately caused or occasioned by the acts, omissions or contributory negligence or other legal liability of third parties, their agents or representatives, or by the instrumentalities of third parties for whom Defendants are not liable. Plaintiff's damages, if any, were the result of an unavoidable accident. Defendants further assert that Plaintiff is not entitled to recover punitive damages as alleged. Please refer to Defendant's latest Answer, discovery responses and expert witness designation. Defendant will supplement as discovery continues.

- (d) the amount and any method of calculating your alleged economic damages;

RESPONSE: Defendants are not seeking economic damages at this time. Defendants will supplement their response as required by the Rules.

- (e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

RESPONSE:

Marcus Wilson Anthony G. Buzbee The Buzbee Law Firm 600 Travis, Suite 6850 Houston, Texas 77002	Plaintiff
T&T Offshore, Inc. c/o Susan Noe Wilson Schouest, Bamdas, Soshea & BenMaier [REDACTED] Houston, TX 77002 [REDACTED]	Employees, witnesses and representatives of T&T Offshore, Inc. may have knowledge regarding the allegations asserted by Plaintiff
Express Services, Inc. [REDACTED] Texas City, TX 77591 [REDACTED]	Employees, witnesses and representatives of Express Services, Inc. may have knowledge regarding the allegations asserted by Plaintiff
Cheramie Marine LLC [REDACTED] Larose, LA 70373 [REDACTED]	Employees, witnesses and representatives of Cheramie Marine LLC may have knowledge regarding the allegations asserted by Plaintiff
Ligthering, LLC (formerly OSG Lightering LLC) [REDACTED] Houston, Texas 77060 [REDACTED]	Employees, witnesses and representatives of OSG Lightering, LLC may have knowledge regarding the allegations asserted by Plaintiff
Jeff Tinney c/o Robert Klawetter [REDACTED]	Employee of T&T Offshore, Inc. may have knowledge regarding the allegations asserted by Plaintiff
Mario Ruiz, Jr. c/o Michael Bell [REDACTED]	Employee of OSG Lightering LLC may have knowledge regarding the allegations asserted by Plaintiff
Mario Ruiz, Sr. c/o Michael Bell [REDACTED]	Employee of OSG Lightering LLC may have knowledge regarding the allegations asserted by Plaintiff

Marisa Ambriz Angela Yvonne Carlisle [REDACTED] c/o A. G. Crouch [REDACTED]	Knowledge regarding paternity issues, Plaintiff's relationship with the decedent and the allegations asserted by Plaintiff.
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- (f) for any testifying expert:
- (1) the expert's name, address, and telephone number;
 - (2) the subject matter on which the expert will testify;
 - (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to your control, documents reflecting such information
 - (4) if the expert is retained by, employed by, or otherwise subject to your control;
 - (a) All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony;
 - (b) the expert's current resume and bibliography;

RESPONSE: Defendants have not yet retained testifying experts.

- (g) any discoverable indemnity and insuring agreements;

RESPONSE: Defendants are seeking indemnity from OSG Lightering LLC, Cheramie Marine LLC and/or Express Services, Inc.

- (h) any discoverable settlement agreements;

RESPONSE: None, other than those already in possession of Plaintiff's counsel.

- (i) any discoverable witness statements;

RESPONSE: None.

- (j) any medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills;

RESPONSE: Not applicable.

- (k) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

RESPONSE: Defendants will make copies of all records available to Plaintiff through its records service. If Plaintiff would like copies of specific records, Defendants ask that Plaintiff specifically identify those records and Defendants will have a copy service deliver same with an invoice. Alternatively, if Plaintiff wishes to review all records, Defendants will produce same for inspection at Defendants' counsel's office during business hours and upon reasonable notice.

- (l) The name, address, and telephone number of any person who may be designated as a responsible third party.

RESPONSE: Express Services, Inc. d/b/a Express Employment Professionals

[REDACTED]
Texas City, TX 77591

[REDACTED]
Cherame Marine LLC

[REDACTED]
Larose, LA 70373